

# Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ADSTRA, LLC,  
Plaintiff,

v. Civil Action No. 24-CV-02639

KINESSO, LLC and  
ACXIOM, LLC

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VIDEOTAPED ORAL DEPOSITION

OF

KYLE HOLLAWAY

(Taken June 7, 2024, at 7:56 a.m.)

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1 Q Yes. Okay. And was Adstra data used in building  
2 that Real ID reference graph?

3 MR. SHAFTEL: Objection to form.

4 A So yes.

5 BY MS. AGUILAR:

6 Q How was Adstra data used in building the Real ID  
7 reference graph?

8 A The Real ID reference graph is built by the  
9 Kinesso engineering team and it is -- the Adstra data  
10 is one of over 30 sources that go into their build  
11 process.

12 Q And are those -- I'm going to use the term "PII."  
13 Do you understand what that means?

14 A I do.

15 Q And what does that mean?

16 A Personally identifiable information, includes  
17 name, address, e-mail, phone, and other potential  
18 identifiers.

19 Q And so did Adstra PII go into the Real ID  
20 reference graph?

21 MR. SHAFTEL: Objection to form.

22 A Yes.

23 BY MS. AGUILAR:

24 Q And were there other pieces of Adstra data that  
25 also went into the Real ID reference graph?

1     A     We evaluated a match rate to the IP address as  
2     well as a hashed representation of the user agent  
3     fields and their connectivity to the hashed e-mail.  
4     This was part of the evaluation for our visitor insight  
5     product.

6     Q     Is the visitor insight product part of the suite  
7     of Real ID products?

8     A     It is an add-on.

9     Q     What do you mean by that?

10    A     Meaning it's sold separately.

11    Q     And what were the results of the evaluation of  
12    that data?

13    A     We chose not to proceed.

14    Q     Why not?

15    A     The mat tray efficacy wasn't what we were looking  
16    for.

17    Q     Does the Visitor Insight product exist today?

18    A     It does.

19    Q     And does it contain any of the Adstra data that  
20    was sent pursuant to the evaluation agreement?

21    A     It does not.

22    Q     Where did that data go if it's not being used by  
23    Acxiom?

24    A     It remained in the storage location where it was  
25    housed.

1     A     I directed Kinesso product manager to remove that  
2     data from the build.

3     Q     Who is that person?

4     A     Veena Xavier.

5     Q     And then was she in charge of removing that data  
6     from the build of the reference graph?

7                     MR. SHAFTEL:  Objection to form.

8     A     She's the product manager and, therefore,  
9     responsible to make sure that takes place.

10    BY MS. AGUILAR:

11    Q     Do you know how long -- well, withdrawn.

12             Do you know whether Veena followed your  
13    instruction and caused the Adstra data to be removed  
14    from the build of the reference graph?

15    A     Yes.

16    Q     How do you know that?

17    A     Confirmation from her as well as a report would  
18    show that data was no longer present.

19    Q     So specifically what of Adstra's data was removed  
20    from the build of the reference graph?

21    A     The terrestrial data.

22    Q     Anything else?

23    A     That's the only data from Adstra that's been  
24    extrapolated as part of the build.

25    Q     And so when that data was removed from the build